

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

FILED
03/11/10
10

UNITED STATES OF AMERICA

CASE NO: 8:03-Cr-77-T-30TBM

v.

SAMEEH HAMMOUDEH

MOTION FOR CONTACT VISIT AND TELEPHONE CALLS

COMES NOW, the Defendant, SAMEEH HAMMOUDEH, by and through his undersigned attorney and moves this Honorable Court to Order the Coleman Correctional Facility, where the Defendant is presently incarcerated, to allow the Defendant contact visits and social telephone calls with his family. As grounds for said Motion the following is alleged:

1. The Defendant is presently incarcerated at a facility approximately ninety (90) miles from his family which makes it difficult for his family to visit him on a regular basis.
2. The Defendant is presently only allowed non-contact visits with his family and rare opportunities to make personal calls (one (1) fifteen (15) minute call per month).
3. That although the Defendant is a pre-trial detainee and presumed innocent, he is provided less privileges than convicted felons at the facility who are routinely allowed contact visits and phone calls.
4. That if the Defendant were housed at a local jail, he could visit with his family on a daily basis and make unlimited telephone calls (albeit collect).

131

WHEREFORE, the Defendant prays that this Honorable Court enter an Order allowing the Defendant contact visits with his wife and three children as well as frequent personal telephone calls to his family.

Dated: May 20, 2003

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Daniel M. Hernandez", written over a horizontal line.

DANIEL M. HERNANDEZ, ESQUIRE

DANIEL M. HERNANDEZ, P.A.

902 N. Armenia Avenue

Tampa, Florida 33609

(813) 875-9694

Attorney for the Defendant

Florida Bar Number 229733

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing has been furnished to the Clerk of Court, Middle District of Florida, located at the Sam Gibbons U.S. Courthouse, 801 N. Florida Avenue, Suite# 223, Tampa, Florida 33602-4500, and correct copy has been furnished to the following interested persons:

Terry Furr, AUSA
U.S. Attorney's Office
400 N. Tampa Street, #3200
Tampa, FL 33602

Donald E. Horrox, Esquire
Federal Public Defender's Office
400 N. Tampa Street, #2700
Tampa, FL 33602
Attorney for Hatim Naji Fariz

Jeffrey G. Brown, Esquire
777 Alderman Road
Palm Harbor, FL 34683
Attorney for Sami Al-Arian

Bruce G. Howie, Esquire
5720 Central Avenue
St. Petersburg, FL 33707
Attorney for Ghassan Zayed Ballut


DANIEL M. HERNANDEZ, ESQUIRE